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WESTERN DISTRICT OF LOUISIANA
LAFAYETTE, LOUISIANA

UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF LOUISIANA

LAFAYETTE-OPELOUSAS DIVISION

UNITED STATES OF AMERICA

VERSUS

KEITH WAYNE THERIOT

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CRIMINAL NO.

18 U.S.C. §§ 287, 1343

JUDGE

MAGISTRATE JUDGE

MAGISTRATE JUDGE METHVIN

CR06 60063

JUDGE DOHERTY

INDICTMENT

THE GRAND JURY CHARGES:

AT ALL TIMES RELEVANT TO THIS INDICTMENT:

A. FEMA Hurricane Katrina Disaster Assistance

1. The Federal Emergency Management Agency ("FEMA") was an agency within the Department of Homeland Security. It provided assistance to the victims of disasters. To be eligible for FEMA assistance based on housing needs, the damaged home in the disaster area must have been where the applicant usually lived and where the applicant was residing at the time of the disaster.
2. In response to Hurricane Rita, FEMA made available to each eligible household \$2,000 in expedited disaster assistance. Those eligible could apply for the expedited assistance by telephone or online. The \$2,000 in expedited disaster assistance was intended to help Rita evacuees with immediate food, shelter, and clothing needs.

B. The Defendant

3. On September 23, 2005, KEITH WAYNE THERIOT, the defendant herein, did not reside at 120 St. Pascal Road, Lafayette, Louisiana.
4. On or about October 4, 2005, KEITH WAYNE THERIOT, caused to be made an application with FEMA for Hurricane Rita disaster relief benefits.

5. On or about October 5, 2005, FEMA disbursed \$2,000 by electronic funds transfer as requested by KEITH WAYNE THERIOT in the application for FEMA benefits.

COUNT 1
18 U.S.C. §§ 287, 2
Making False Claims

The allegations contained above are incorporated by reference.

On or about the 4th day of October 2005, in the Western District of Louisiana, the defendant herein, KEITH WAYNE THERIOT, caused to be made and presented a claim against and upon FEMA, an agency of the United States, for Hurricane Rita disaster assistance benefits, knowing that the claim was false, fictitious, and fraudulent in that, when Hurricane Rita struck the Lake Charles, Louisiana area, KEITH WAYNE THERIOT did not reside at 120 St. Pascal Road, Lafayette, Louisiana, as the defendant stated in his claim, all in violation of Title 18, United States Code, Sections 287 and 2. [18 U.S.C. §§ 287, 2].

COUNT 2
18 U.S.C. § 1343
Wire Fraud

The allegations contained above are incorporated by reference.

Beginning on or about late September 2005, in the Western District of Louisiana, the defendant, KEITH WAYNE THERIOT, devised and executed a scheme and artifice to defraud the United States and for obtaining money and property by means of false and fraudulent pretenses, representations and promises by filing a claim for \$2,000 in emergency benefits from the Federal Emergency Management Agency stating that he received damage to his property, as a result of Hurricane Rita when he knew it was in fact false.

On or about the 5th day of October, 2005, in the Western District of Louisiana, the Defendant, KEITH WAYNE THERIOT, having devised the above-described scheme and artifice to obtain money or property by means of false pretenses, for the purpose of executing and in order to effect the scheme and artifice to obtain money or property, did knowingly cause to be electronically transferred funds from FEMA to Advancial Federal Credit Account Number 8741101 to the benefit of KEITH WAYNE THERIOT, a \$2,000 wire transfer from the United States Department of Treasury, all in violation of Title 18, United States Code, Section 1343. [18 U.S.C. § 1343].

A

REDACTED

F

DONALD W. WASHINGTON
United States Attorney

A handwritten signature in black ink, appearing to read "Howard C. Parker", written over a horizontal line.

HOWARD C. PARKER, ID # 800008
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